

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHELLE BEEBE,

Plaintiff,

v.

WILLIAMS COLLEGE,

Defendant.

Civil Action No. 05-30182

**MOTION FOR LEAVE OF COURT TO ALLOW AMENDED EXPERT
DESIGNATION**

Defendant Williams College (the “College”) seeks leave of the Court to amend its expert designation, made to Plaintiff Michelle Beebe (“Plaintiff”) on April 27, 2007 pursuant to Fed. R. Civ. P. 26(a)(2). In place of Steve Miller, the College seeks leave of the Court to designate Nancy Segreve, MA, CRC of Occupational Resource Network, Inc., 305 North Main Street, Andover, MA 01810. Ms. Segreve is a vocational expert who will testify about the same matters for which the College originally designated Mr. Miller; that is, Plaintiff’s attempts to secure other employment and about the existence of other employment that might have been available to her during the relevant time period. Counsel for the College notified Plaintiff’s Counsel of this expert and provided him with her curriculum vitae by fax on Thursday, May 3, 2007, less than one week after the Court’s deadline for designating expert witnesses. The College’s amended designation is harmless or, alternatively, substantially justified under Fed. R. Civ. P. 37(c)(1).

The College respectfully requests that the Court grant its Motion.

REQUEST FOR ORAL ARGUMENT

The College further seeks a hearing on its Motion.

Respectfully submitted,
Williams College
By its attorneys,

/s/ Patricia M. Higgins

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Dated: May 4, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Patricia M. Higgins